

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

**PLAINTIFF'S NOTICE OF FILING
AMENDED PLEADING BY WRITTEN
CONSENT**

COMES NOW Plaintiff Anne Marie Pickraum and gives notice of filing and Amended Complaint by written consent of opposing counsel, to remove C.R. Bard, Inc. as a Defendant. A copy of the amended pleading is filed concurrently with this Notice as Exhibit A, reflecting this change by bracketing and strikethrough at numbered paragraph 8. Other than the removal of Defendant C.R. Bard, Inc., no changes or amendments have been made to Plaintiff's Complaint.

Respectfully submitted,

FLEMING, NOLEN & JEZ, L.L.P.

By: /s/ Rand P. Nolen

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Attorneys for Plaintiffs

CERTIFICATE OF WRITTEN CONSENT OF OPPOSING COUNSEL

1 I hereby certify that on this 1st day of October, 2019, I requested written consent of opposing
2 counsel prior to filing Plaintiff Anne Marie Pickraum's First Amended Short Form
3 Complaint, and received such written consent from Matthew Lerner of Nelson Mullins,
4 LLP, counsel for Defendants, via email on October 1, 2019.

5 /s/ Rand P. Nolen

6 **CERTIFICATE OF SERVICE**

7 I hereby certify that on this 1st day of October, 2019, I electronically transmitted the attached
8 document to the Clerk's Office using the CM/ECF System for filing and transmittal of a
9 Notice of Electronic Filing.

10 /s/ Rand P. Nolen